

### REMARKS/ARGUMENTS

These Remarks are responsive to the Office Action mailed March 23, 2006 ("Office Action"). Applicants respectfully request reconsideration of the rejections of the pending claims for at least the following reasons.

The Examiner has rejected claim 151 under 35 U.S.C. § 112, 2<sup>nd</sup> para., as being indefinite for use of the terms "center" and "edge." As stated previously, Applicants do not agree that the claim as originally submitted was indefinite. Furthermore, the use of center and edge in the previous amendment was in response to the Examiner's suggestion. However, as Examiner has further clarified her objection to the terminology, in an effort to advance prosecution of the case, applicants have amended claim 151 to clearly provide a reference point for the "inward" and "outward" terminology. Support is provided for this terminology on p.16-17 and Fig. 2. Applicants respectfully submit that the rejection under 35 U.S.C. § 112, 2<sup>nd</sup> para., is obviated by the present amendment and request that it be withdrawn.

As acknowledged in the Office Action, claim 151 distinguishes over the prior art and is therefore allowable. *See* Office Action, para. 11. Applicants respectfully request notice that claim 151 is allowable in the next communication from the Examiner.

In Applicants' previous response, claims 1 and 129 were amended in an attempt to further clarify the voltage levels used to perform the claimed methods. However, the Examiner has found that amendment to render the claims indefinite or unsupported by the disclosure as originally filed. While Applicants do not agree that the previous amendment was not supported or renders the claims indefinite, in an effort to advance prosecution, Applicants have reverted claims 1 and 129 to their previous form (with definite, supported voltage levels specified).

Independent claims 1 and 129 stand rejected under 35 U.S.C. § 103(a) as unpatentable over White in view of Sakamoto, Yaginuma or Nimmagadda. Applicants respectfully submit that none of the cited references, nor their proposed combination recite operation within the claimed voltage and pressure levels. Furthermore, Applicants respectfully submit that it would not have been obvious to modify the cited references to operate at the claimed DC voltage level because the prior art uses

magnetic fields (see, e.g., White, items 78) that causes detrimental variation in the deposition thickness at the claimed voltage level. For at least these reasons, applicants respectfully submit that the asserted rejections of claims 1 and 129 are improper and request that they be withdrawn.

Dependent claims 2-5, 7, 8, 15-17, 24, 25, 27-28, 32-50, 52-57, 59-62, 67-68, 70-81, 85-88, 90-95, 98-103, 105, 111-114, 118-128 and 132 depend from one of claim 1 or 129 and, thus, contain the features recited in the independent claims. Therefore, applicants respectfully submit that the dependent claims are allowable for at least the reasons given above with respect to claims 1 and 129. Applicants respectfully request that the rejections of the dependent claims be withdrawn.

**CONCLUSION**

In the event any variance exists between the amount authorized to be charge to the Deposit Account and the Patent Office charges, please charge or credit any difference to the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS LLP

By: \_\_\_\_\_



George Y. Wang  
Registration No. 58,637

For: Thomas E. Anderson  
Registration No. 37,063

Dated: October 4, 2006

Hunton & Williams LLP  
Intellectual Property Department  
1900 K Street, N.W.  
Suite 1200  
Washington, DC 20006-1109  
(202) 955-1500 (telephone)  
(202) 778-2201 (facsimile)